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*Attorneys for Defendant Michael  
Foit and Paul Lewis*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

APEX ENERGY SOLUTIONS OF  
SEATTLE, LLC,

Judgment Debtor,

v.

CHRISTOPHER L. HUBBARD,

Judgment Creditor/Plaintiff,

v.

MICHAEL FOIT and PAUL LEWIS,

Defendants.

NO. C24-00672 RSM

**STIPULATION AND ORDER  
FOR WITHDRAWAL AND  
SUBSTITUTION OF  
COUNSEL**

**(CLERK'S ACTION  
REQUIRED)**

**STIPULATION**

The parties hereby stipulate as follows:

1. Claire H. Taylor and Joshua Harms of the law firm of **STOKES  
LAWRENCE, P.S.**, located at 1420 Fifth Avenue, Suite 3000, Seattle, WA  
98101 shall withdraw as Attorneys of Record for defendants Michael Foit and  
Paul Lewis.



2. Kevin A. Bay and Julia J. Fleming of **RYAN, SWANSON & CLEVELAND, PLLC**, located at 401 Union Street, Suite 1500, Seattle, Washington 98101-2668 shall be substituted as Attorneys of Record for defendants Michael Foit and Paul Lewis.

3. Copies of all further papers and proceedings herein, except original process, shall be served upon the substituting Attorneys of Record; and

4. This withdrawal and substitution of attorneys will be effective immediately.

DATED this 10th day of September, 2024.

**RYAN, SWANSON &  
CLEVELAND, PLLC**

**STOKES LAWRENCE, P.S.**

By: /s/ Kevin A. Bay

Kevin A. Bay, WSBA #19821  
Julia J. Fleming, WSBA #58743  
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***Substituting Attorneys for Defendants  
Michael Foit and Paul Lewis***

By: /s/ Claire H. Taylor

Claire H. Taylor, WSBA #47067  
Joshua Harms, WSBA #55679  
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***Withdrawing Attorneys for  
Defendants Michael Foit and Paul  
Lewis***

**CORR DOWNS PLLC**

By: /s/ Jacob M. Downs

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***Attorneys for Judgment Creditor***

***Christopher L. Hubbard***

**ORDER**

Pursuant to the parties' Stipulation it is hereby Ordered:

The Court grants leave for Claire H. Taylor and Joshua Harms of the law firm of **STOKES LAWRENCE, P.S.**, located at 1420 Fifth Avenue, Suite 3000, Seattle, WA 98101 to withdraw as Attorneys of Record for defendants Michael Foit and Paul Lewis, and

Kevin A. Bay and Julia J. Fleming of **RYAN, SWANSON & CLEVELAND, PLLC**, located at 401 Union Street, Suite 1500, Seattle, Washington 98101-2668 shall be substituted as Attorneys of Record for defendants Michael Foit and Paul Lewis.

DATED this 10<sup>th</sup> day of September, 2024.



**RICARDO S. MARTINEZ**  
**UNITED STATES DISTRICT JUDGE**

1 Presented by:

2 **RYAN, SWANSON & CLEVELAND, PLLC**

3  
4 By: /s/ Kevin A. Bay

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9 ***Substituting Attorneys for Defendants***

10 ***Michael Foit and Paul Lewis***

11 **STOKES LAWRENCE, P.S.**

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18 ***Withdrawing Attorneys for Defendants***

19 ***Michael Foit and Paul Lewis***

20 **CORR DOWNS PLLC**

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26 ***Attorneys for Judgment Creditor***

***Christopher L. Hubbard***

STIPULATION AND ORDER FOR WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL- 4

No. 24-cv-00672 RSM



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on the 10th day of September, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

DATED this 10th day of September, 2024, at Seattle, Washington.

By: /s/BonniLee Ball  
BonniLee Ball, Legal Assistant  
[ball@ryanlaw.com](mailto:ball@ryanlaw.com)